

A<sub>1</sub> then be displayed to the user, step 750, although the results may also be sent to a file, table, disk, etc.

In the Claims

Please rewrite claim 14 as shown below:

14. (Amended) A method of customizing a marketing campaign application running on a computer system, the method comprising steps of:

A<sub>2</sub> providing a client-side plug-in component;

providing a server-side plug-in component;

configuring the client-side plug-in component into the application;

configuring the server-side plug-in component into the application; and

communicating between the client-side plug-in component and the server-side plug-in component.

REMARKS

In response to the Office Action mailed June 19, 2002, Applicant respectfully requests reconsideration. Applicant has carefully considered the comments and art cited in the Office Action. Claims 1-21 are pending. Applicant has amended the specification at page 28 and amended claim 14.

Attached hereto are marked-up versions of the changes made to the specification and to the claims by the current amendment. The attached pages are captioned "**MARKED-UP SPECIFICATION**" and "**MARKED-UP CLAIMS**," respectively.

Applicant has filed, together herewith, a petition for a three month extension of time and a check for the appropriate fee. It is not believed that additional extensions of time are required. In the event that additional extensions of time are necessary, however, then such extensions of time are hereby petitioned under 37 C.F.R. §1.136(a). Any additional fees required for consideration of this paper (including fees for net addition of claims) are authorized to be charged in the two copies of the amendment transmittal letter filed herewith. The Commissioner

is hereby authorized to charge any additional fees, which may be required, or credit any overpayment to Deposit Account No. 23/2825.

### **Drawings**

The Office Action objects to various figures as not including reference numerals mentioned in the description (i.e., Fig. 10A) and to other figures as including reference numerals for which there is no specific reference in the specification (i.e., Figs. 4, 5, 7, 8, 9, and 11). With respect to the objection to Fig. 10A, Applicant has amended the specification by replacing the reference numeral "71" with "71a" which is identified in the drawing of Fig. 10A. With respect to Figs. 4, 5, 7, 8, 9, and 11, Applicant is submitting corrected drawings with the cited reference numerals omitted. A copy of the corrected drawings with the changes marked in red is attached. Approval and entry of the corrected drawings is respectfully requested.

### **Section 112 rejection**

The Office Action asserts that the limitation "the application" in Claim 14 lacks proper antecedent basis. Applicant thanks the Examiner for the careful examination of the claims and has amended claim 14 to obviate the rejection.

### **Section 103 rejections**

The Office Action rejects claims 1-21 under 35 U.S.C. Sec. 103, stating that it is unpatentable based in whole or in part on the combination of DiAngelo and Cosic. The rejections are respectfully traversed.

DiAngelo discloses an on-line (Internet) purchasing system that includes a browser. The Office Action cites Column 5 as disclosing a "plug-in" for those browsers, to add "universal shopping cart functionality." The plug-in is designed to facilitate purchasing products from enabled web sites. The Office Action states that these plug-ins are "client-side plug-in components" as recited, for example, in claim 1.

Cosic refers to a medical imaging system. In Cosic, plug-in tools are put into work stations to permit those work stations to display data. Cosic addresses the issue of communications provided given in a common medical imaging format (i.e., DICOM) and the

difficulty in demonstrating those images on heterogeneous work stations. The solution proposed by Cosic included plug-in tools written in a common language (Java) for the various work stations. The Office Action states that these plug-ins are “server-side plug-in components” as recited, for example, in claim 1.

Claim 1 recites associating a client-side plug-in component with a server-side plug-in component and operating the server-side plug-in in response to data input from the client side plug-in component. The combination of DiAngelo and Cosic does not teach this.

As a preliminary matter, Cosic concerns plug-ins on workstations – not servers. Consequently, Cosic does not appear to teach a server-side plug-in component at all. As a result, no combination of DiAngelo and Cosic can support a rejection.

More importantly, no identified teaching in either reference suggests or motivates associating client-side and server-side plug-in components with one another. Quite the contrary, such a combination would be counterintuitive. Cosic teaches locating plug-ins in one location – not coordinating the functionality of the two. Further, Cosic teaches having different plug-ins for performing the same functions on different types of workstations which all receive the same (DICOM) input. DiAngelo similarly teaches one plug-in at one location (Internet users) – not any mode of cooperation or relationship among different types of plug-ins at different locations. In short, each of Cosic and DiAngelo is inconsistent with the method described in claim 1.

Indeed, it is entirely unclear what one would end up with if Cosic and DiAngelo were combined. Literally, one would have a medical imaging workstation with a shopping cart. Even taking each reference at its most general, one would make a system with two client-side plug-ins. The Office Action does not describe what combination would result, and no combination would seem to result in a method as recited in Claim 1.

Accordingly, Applicant respectfully requests that the rejection of Claim 1 be withdrawn.

The remaining rejections all depend on the combination of DiAngelo and Cosic and Applicant requests that they be withdrawn for similar reasons.

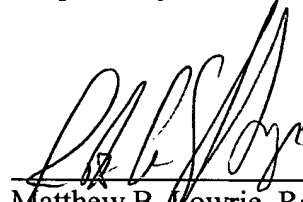
### **CONCLUSION**

In view of the foregoing amendments and remarks, this application should now be in condition for allowance. A notice to this effect is respectfully requested. If the Examiner

believes, after this amendment, that the application is not in condition for allowance, the Examiner is requested to call the Applicant's attorney at the telephone number listed below.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicant hereby requests any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 23/2825.

Respectfully submitted,



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**MARKED-UP SPECIFICATION**

The third full paragraph beginning at line 14 of page 28 has been amended as shown below:

For example, the server may complete processing operations to identify a group of customers in a geographic region from a group of customers from, for example, a marketing database. The resulting list of customers identified by the server part of the application 78a is sent in a response 75 to the client-side of the application [71] 71a at step 740. The resulting list may then be displayed to the user, step 750, although the results may also be sent to a file, table, disk, etc.

**MARKED-UP CLAIMS**

Claim 14 has been amended as shown below:

14. (Amended) A method of customizing a marketing campaign [system] application running on a computer system, the method comprising steps of:
- providing a client-side plug-in component;
  - providing a server-side plug-in component;
  - configuring the client-side plug-in component into the application;
  - configuring the server-side plug-in component into the application; and
  - communicating between the client-side plug-in component and the server-side plug-in component.